



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: JOHN STAPLES
ASSOCIATE CHIEF COUNSEL (INTERNATIONAL)

FROM: Sean F. Foley, APA Program Director

DATE: July 17, 2002

SUBJECT: APA Quarterly Report for FY 2002,
Third Quarter Ending 6/30/02

The following are the APA Program's results for the third quarter of FY 2002 ("Q3").

APAs Completed

The APA Program completed 28 APA matters in Q3. That number consists of 22 bilateral APAs (7 renewals), 5 unilateral APAs (0 renewals) and 1 bilateral amendment.

Negotiating-Position Papers

The APA Program completed 37 bilateral negotiating position papers in Q3, five of which involved a renewal APA request.

Other

11 taxpayers withdrew APA requests in Q3, 9 of which were bilateral and 2 of which were unilateral.

Annual Reports

The APA Program completed its review of, and closed 85 annual reports in Q3.

New Matters

The APA Program received 23 new APA matters in Q3. Seventeen of the 23 new matters are bilateral. Five of the 17 bilateral matters involved renewals and one is an amendment. Six of the new matters are unilateral. Three of the 6 unilateral matters involved renewals.

APA Inventory

The APA Program has an ending inventory of 204 open matters.¹ This consists of 169 bilateral and 35 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of June 30, 2002. Please contact Sean Foley at (202) 874-3850 if any additional information is required.

Respectfully submitted,

Sean Foley, APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

1. This equals beginning Q3 inventory of 220 matters, plus 23 receipts, less 28 closures and 11 cases withdrawn { $220 + 23 - 28 - 11 = 204$ }.

2. The 204 open matters include 7 pending dollar filings (4 bilateral and 3 unilateral): Thus

\$ The APA Program has an inventory of 197 active cases, i.e., 204 open matters less 7 pending dollar filings.

\$ The 197 active cases consist of 165 bilateral cases (169 total bilateral matters less 4 pending bilateral dollar filings) and 31 unilateral cases (35 total unilateral matters less 4 pending dollar filings).

\$ The APA Program has forwarded 111 of the 165 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 85 cases, consisting of 54 bilateral (165 active bilateral cases less 111 forwarded to Competent Authority) and 31 active unilateral cases.